

LAW OFFICES

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August 30, 2019

Via ECF

Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

**Re: United States v. Michael Avenatti, No. 19-cr-373 (PGG)
Request to File Rule 17(c) Requests by Sept. 6, 2019**

Dear Judge Gardephe:

I am co-counsel for defendant Michael Avenatti. This morning, the Court granted undersigned counsel's request to file requests for subpoenas duces tecum pursuant to Fed.R.Crim.P. 17(c) by Tuesday, September 3, 2019. (Dkt. 43). I have a conference call scheduled with government counsel this afternoon in an effort to reach agreement on matters related to the subpoenas (namely, redactions of any exhibits).

Given that Hurricane Dorian now appears to be bearing down on South Florida and is scheduled to make landfall on Monday or Tuesday, it is likely that I will be evacuating my family from South Florida this weekend and my office will be closed on Tuesday, September 3. Thus, while I still hope to file the requests by Tuesday, in an abundance of caution, I am requesting permission from the Court to file the requests on or before Friday, September 6, 2019. Government counsel have advised that they have no objection.

Thank you for your consideration.

Respectfully,



Scott A. Srebnick

cc: Counsel of Record (via ECF)